

Amendments to the Drawings:

The attached sheet of drawing includes changes to Fig. 2. No annotated sheets have been submitted since the drawing changes should be readily apparent to the Examiner, e.g, two occurrences of the reference numeral 23 and its lead line have been deleted from the Figure.

REMARKS

Reconsideration and/or clarification of the objection to the drawings is requested inasmuch as numerals “20” and “22” are shown in Fig. 2.

The objections to the Specification and Claims have been addressed by way of the foregoing amendments.

Likewise, the rejection of Claims 43-52, 55 and 58-61 under 35 U.S.C. § 112, ¶ 2 is deemed to have been addressed also by way of the foregoing claim amendments. Reconsideration is therefore respectfully requested.

The rejection of Claims 43, 44, 49, 52, 55 and 61, as being unpatentable over Ong et al., in view of Neerinck et al., under 35 U.S.C. § 103(a) is deemed moot in light of the amendment to Claim 43 in which subject matter of Claims 51 and 60 have been incorporated therein.

The rejections of Claims 47, 48 and 51 over Ong et al., in view of Neerinck et al., and further in view of Rzađ et al., and of Claims 58 and 59 over Ong et al., in view of Neerinck et al., and further in view of Hashimoto et al., each under 35 U.S.C. § 103(a), are traversed. Reconsideration of each of these rejections is respectfully requested in light of the foregoing amendments and following remarks.

Applicants', now-claimed process is one that would require the hypothetical combination of four references, namely Ong et al., Neerinck et al., Ichimura et al., and Rzađ et al. Although there is no theoretical limit on the number of references that can be combined without evidently exercising impermissible hindsight, nevertheless, the need to combine four references raises serious concerns about whether a *prima facie* case of obviousness has been made based upon record evidence and without motivation provided only by the Applicants. Here, Applicants submit that such a *prima facie* case has not been made even if one accepted the proposition, for argument's sake alone, that Ong et al., and Neerinck et al., teachings would have been combinable.

For example, with regard to the claimed additional pulsed substrate bias voltage in the medium frequency range, the Office Action points to no teaching in the prior art where such a voltage is applied on the vapor depositing of the adhesive layer. Although such feature was found in former Claim 51, none of the prior art applied thereagainst is asserted to contain such a teaching. All that Ichimura et al., disclose is the application of an AC bias voltage by a high frequency power supply. Absent the use of impermissible hindsight, one skilled in the relevant art seeking to produce an improved wear-protection layer system would never have looked to Ichimura et al.'s, teachings, which are directed to microwave plasma processing for a CVD film formation and the like where a waveguide transmits microwaves with a frequency of 2.24 GHz. That is, the

teachings of the Ichimura et al., patent are irrelevant to the claimed invention herein.

Applicants would further note that the Ichimura et al., patent also does not teach, nor could it suggest, the claimed superimposition of the variable longitudinal magnetic field during cleaning of the surface and application of the adhesive layer and/or application of a transition layer and application of the adamantane carbon layer. Again, Ichimura et al., was not concerned with an adhesive layer, transition layer, and adamantane carbon layer. The suggestion that the teachings of that patent (only its Abstract is referenced in the Office Action) would have led one of ordinary skill in developing a process to produce a wear-protection layer system to superimpose a longitudinal magnetic field on the substrate can only be based upon impermissible hindsight.

Accordingly, early and favorable action is earnestly solicited.

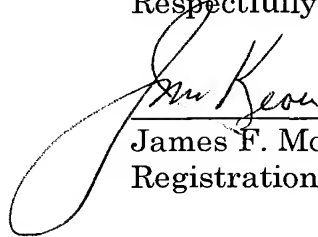
If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and

please charge any deficiency in fees or credit any overpayments to Deposit
Account No. 05-1323 (Docket #080313.48830D1).

Respectfully submitted,

March 6, 2007



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